

Thompson promptly appropriated the money to his own use, and the plaintiff now claimed to recover his loss from the newspaper proprietor. The defendants contended that the defendants' negligence was not the immediate cause of the loss but the fraud of Thompson, but Lord Alverstone, C.J., who tried the action held that the defendants had been guilty of a breach of duty to take reasonable care in recommending a broker, and were liable to the plaintiff for the whole loss sustained by him.

SHIP—CHARTER PARTY—DEMURRAGE—LAY DAYS—ARRIVAL AT
PLACE OF LOADING—OBLIGATION OF MASTER TO GO TO BERTH
NAMED BY CHARTERER.

Leonis SS. Co. v. Rank (1907) 1 K.B. 344 was an action by shipowners for demurrage. The charter party provided that the charterers should ship a cargo and that the time for loading should commence to count twelve hours after written notice had been received from the master that the ship was in readiness to receive a cargo. The ship arrived at the port of lading and anchored in a river within the port a few ship's length off the pier, and written notice was given of its readiness to receive cargo. The place where the ship was anchored was not the usual loading place, but a possible place. The charterers required her to be brought alongside the pier, but owing to the crowded state of the port she was delayed in getting a berth there. Channel, J., held that the twelve hours did not begin when the notice of readiness to load was given by the master, but from the time the vessel got a berth at the pier.

TRADE UNION—RAISING FUND FOR MAINTENANCE OF MEMBERS OF
PARLIAMENT—RULES OF UNION—LEVYING CONTRIBUTIONS—
INJUNCTION—JURISDICTION OF COURT—TRADE UNION ACT,
1874, s. 4—(R.S.C. c. 125, s. 4).

Steele v. South Wales Miners' Federation (1907) 1 K.B. 361. This was an action by a member of a trade union for an injunction to restrain the defendants the union, from levying contributions from the plaintiff for a fund to be applied in the support of a member of Parliament. The rules of the union provided that one of its objects was to provide funds wherewith to pay the expenses of returning and maintaining representatives to Parliament, but no provision was made for raising such funds. A resolution in favour of a general contribution